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"I will stand for my client's rights.
I am a trial lawyer."
—Ron Motley (1944–2013)

VIA CM/ECF

November 23, 2021

The Honorable George B. Daniels
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)
Burnett, et al. v. Islamic Rep. of Iran, et al., 15-cv-09903 (GBD)(SN)
Arias, et al. v. Islamic Rep. of Iran, 19-cv-00041 (GBD)(SN)
Prior, et al. v. Islamic Rep. of Iran, 19-cv-00044 (GBD)(SN)

Dear Judge Daniels:

On October 8, 2021, the Plaintiffs' Executive Committees ("PECs") wrote the Court requesting that it enter amended versions of nine judgments that were originally filed on October 5, 2021. *See* ECF No. 7247. The purpose of that letter was to request that the judgments be refiled on the docket with the corresponding exhibits attached to the judgment order. Since that time, our records indicate that the court has refiled four of the nine judgments with the corresponding exhibits now attached (*Chairnoff* – ECF No. 7173; *Anaya* – ECF No. 7178; *Prior V* – ECF No. 7182; and *Cloud* – ECF No. 7186). Unfortunately, one of these re-issued judgments (*Prior V* – ECF No. 7182) has the judgment values cut off from the exhibit table. Additionally, on October 25, 2021, the court entered judgment on behalf of the *Burnett/Iran XXIV* plaintiffs (ECF No. 7287), again with the judgment values cut off from the exhibit table.

As the court is no doubt aware, the U.S. Victims of State Sponsored Terrorism Fund ("USVSSTF") requires that an individual submitting a claim must provide proof of a final judgment issued by a United States district court awarding the applicant compensatory damages against a designated foreign state sponsor of terrorism. Since the value of a claimant's compensation from the USVSSTF is based primarily on the value of that individual's judgment, a copy of the final judgment clearly indicating the individual(s) on whose behalf the judgment was entered and the value of that judgment is necessary for the USVSSTF not only to approve the claim but also determine the appropriate total eligible claim amount. As such, we respectfully request that the court re-issue the following judgments with the full and unabridged exhibits attached.



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- 1) *Arias V* – ECF No. 7180;
- 2) *Prior V* – ECF No. 7182;
- 3) *Burnett/Iran XXIII* – ECF No. 7188; and
- 4) *Burnett/Iran XXIV* – ECF No. 7287.

For the court's convenience, we are attaching to this letter copies of the proposed orders and applicable exhibits listed above.

Respectfully submitted,

John M. Eubanks

JME/dk

Enclosures

Cc: All counsel of record via CM/ECF